REMARKS

Claims 1, 3-12, 14-23, 25-34, 36, and 37 are pending in the present application. Claims 9, 20, and 31 were canceled, and claims 1, 10-12, 21-23, 32-24, and 36 were amended. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 102, Anticipation, Claims 1, 3-12, 14-23, 25-34, 36, and 37

The Examiner has rejected claims 1, 3-12, 14-23, 25-34, 36, and 37 under 35 U.S.C. § 102 as being anticipated by *Himmel* (US Patent No. 6,167,441). This rejection is respectfully traversed.

With regard to claim 1, the Examiner states:

> Himmel teaches the invention as claimed including customization of WEB pages based on requester type (see abstract).
>
> As to claim 1, Himmel teaches a method in a data processing system, comprising the steps of:
>
> receiving, from a client, a request for a host screen; navigating to the host screen; retrieving the host screen (see fig.2; col. 4-5, Himmel discloses receiving a request for a host screen and retrieving the requested web page);
>
> formatting the host screen. into a formatted host screen, wherein the formatted host screen. displays selectable links to other screens within a host stem; and sending the formatted host screen to the client (see co. 7, lines 30-55, Himmel discloses retrieving a requested web page and reformatting it based on the requester type and sending it to the client). (*Office Action*, dated September 29, 2003, page 2).

A prior art reference anticipates the claimed invention under 35 U.S.C. §102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). The *Himmel* reference cited by the Examiner does not anticipate the present invention as recited in amended claim 1 because *Himmel* fails to teach each and every element of the claims. Amended independent claim 1, which is representative of amended independent claims 12, 23, and 34, reads as follows:

> 1. A method in a data processing system for navigating screens in a legacy host system, comprising the steps of:
>
> receiving, from a client, a request for a host screen;
>
> navigating to the host screen;
>
> retrieving the host screen;

formatting the host screen into a formatted host screen from a non-markup language to a markup language, wherein the formatted host screen displays selectable links to other screens within host system; and

sending the formatted host screen to the client.

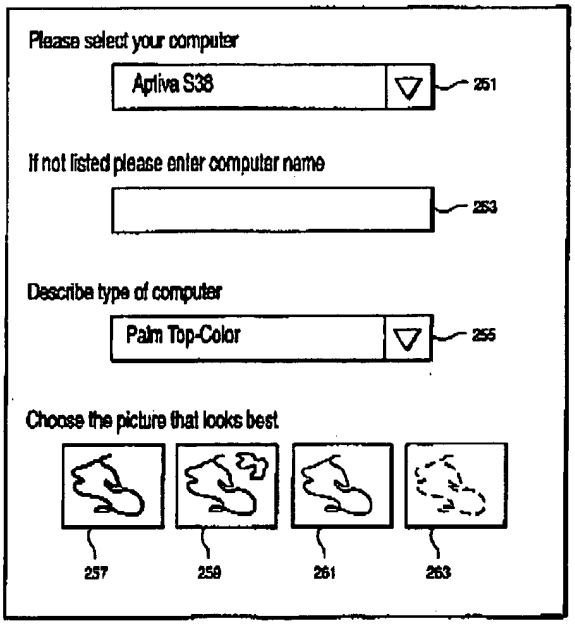
Himmel is directed towards providing customized Internet content to a requesting client device using an intercepting agent. When a client device requests a file from a web server, the agent, typically located at the web server receiving the client request, intercepts the request. The agent then detects client device capability information about the requesting client device, such as display or memory capabilities. The client request is redirected to a Uniform Resource Locator (URL) according to the detected client device capability information to retrieve a version of the requested file. (*Himmel*, col. 2, lines 25-35).

Himmel fails to teach formatting the host screen into a formatted host screen from a non-markup language to a markup language, wherein the formatted host screen displays selectable links to other screens within the host system, as recited in amended claim 1 of the present invention. The examiner states, "Himmel discloses retrieving a requested web page and reformatting it based on the requester type and sending it to the client," and cites the following passage of *Himmel*:

> The page can originate with the snooper agent already at the client or from the client-smart agent back at the server. In step 215, user input to the page is received and sent back to the client-smart agent. Based on the information from the parsing, snooping or receiving steps, the client-smart agent determines the appropriate page to send the HTTP request, step 217. The selected web page is dynamically reformatted, if necessary, according to the detected client type. Finally, in step 221, the selected web page is sent to the client machine.
>
> The invention provides that some of the customization of the page interface is static with prebuilt web pages for a supported client device or set of client devices. Other aspects of the customization may be dynamic modification of the web page content performed on the fly. Requests from clients having vastly different display sizes are likely to be directed to different web pages on different URLs. Requests from clients with similar screen sizes, but different display characteristics such as color palettes may be directed to the same URL, however, the embedded URLs which point to image data within the overall page may be dynamically selected to provide the image which will look the best for the detected client device. Yet others such as font or font size can be dynamically adjusted in the HTML on the fly.

In addition to the device type consideration, the invention can be used to deal with browser considerations as well. (*Himmel*, col. 7, lines 30-55).

The passage above fails to mention the feature of formatting a host screen from a nonmarkup language to a markup language, wherein the formatted screen displays selectable links to other screens within the host. Instead, the passage above teaches providing an agent that detects client device capability information about the requesting client device. The agent parses the header information of the client request to determine the client capability, or alternatively, the agent may receive client capability information from the user. *Himmel* teaches that if the agent is unsuccessful in parsing the request header, the agent may send a web page to the user asking the user to identify the client device type. A sample web page that may be sent to the user is shown below in Figure 6 of *Himmel*:



Thus, as Figure 6 illustrates, the user presented with a dialog page, wherein the user selects the client computer and/or type of computer that he or she is using. The user may also select an image from a set of images that looks the best to the user. Based on this client device information and image input received from the user, the appropriate

web page is selected for the requesting client, and the web page may be reformatted based on the client device type.

However, *Himmel* does not teach formatting a host screen from a nonmarkup language to a markup language. Instead, *Himmel* teaches reformatting a web page, already in markup language, to conform to the presentation capabilities of the requesting client device. For example, column 5, lines 32-36 of *Himmel* recites receiving HTML requests from a client and using a "client-smart agent" to redirect the web server to the correct web page based on the client device. Column 7, lines 40-42 of *Himmel* recites "some of the customization of the page interface is static with prebuilt web pages for a supported client device". There is no mention in *Himmel* that the formatting of the web page is performed from a nonmarkup language to a markup language. Even *Himmel's* dynamic modification of the web page content as described in column 7, lines 42-44 reformats a web page which is already in markup language.

In contrast, the present invention formats the host screen from a nonmarkup language to a markup language. As many computer resources were written before the Internet became a cultural fixture and without contemplating adaptation of the application, service, or data to an Internet connected world, these legacy systems to which users desire access must be reformatted such that they are readable and useable by web browsers. However, even with reformatting, a user may be required to be familiar with the particular commands necessary to navigate through the various screens contained within a legacy host system. The present invention may format the screen from a legacy system format to an XML or HTML format, for example. In this manner, a screen in a legacy host system, presented in a nonmarkup language, may be reformatted so that a user may navigate the legacy system without requiring knowledge of system specific commands necessary to navigate through the system in the legacy system format. Thus, the present invention provides for formatting the legacy host screen from a nonmarkup language to a markup language in order to allow a user, without knowledge of system specific commands, to access and navigate the legacy system.

Thus, in view of the *Himmel* passages above and Figure 6, a web page is selected based on the client device display capabilities parsed from the client request, or alternatively, based on user input of selecting the client device type. If necessary, the

selected web page, already in a markup language, may then be reformatted. The selected web page is reformatted for readability for the particular client device (*Himmel*, col. 4, lines 42-45), thereby enabling multiple different web client types to be supported by an Internet application. However, there is no mention in *Himmel* of the feature formatting the host screen from a nonmarkup language to a markup language as recited in claim 1. Thus, *Himmel* has not been shown to teach the feature of formatting a host screen from a nonmarkup language to a markup language, wherein the formatted screen displays selectable links to other screens within a legacy host system, and therefore fails to anticipate claim 1.

In view of the above, *Himmel* fails to teach each and every element of independent claim 1. Providing a web page in which a user selects a device and/or device type and reformatting the web page does not teach the present invention's feature of formatting a host screen from a nonmarkup language to a markup language as recited in claim 1. As a result, the *Himmel* reference fails to anticipate claims 1, 12, 23, and 34 of the present invention.

Claims 3-11, 14-22, 25-33, and 36-37 are dependent claims depending upon independent claims 1, 12, 23, and 34, respectively. Applicants have already demonstrated claims 1, 12, 23, and 34 to be in condition for allowance. Applicants respectfully submit that claims 3-11, 14-22, 25-33, and 36-37 are also allowable, at least by virtue of their dependency on an allowable claim.

Therefore, the rejection of claims 1,3-12, 14-23, 25-34, and 36-37 under 35 U.S.C. § 102 has been overcome.

Furthermore, *Himmel* does not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. *Himmel* merely teaches a system that enables multiple different web client types to be supported by an Internet application by creating a set of web pages, each of which is already in a markup language and reformatted for readability for a particular supported device (*Himmel*, col. 4, lines 42-45) as opposed to formatting the host screen from a nonmarkup language to a markup language as in the presently claimed invention. Absent the examiner pointing out some teaching or incentive to implement *Himmel* and formatting the host screen from a nonmarkup language to a markup language, one of ordinary skill in the art would not be

led to modify *Himmel* to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion, or incentive to modify *Himmel* in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the applicants' disclosure as a template to make the necessary changes to reach the claimed invention.

II. Conclusion

It is respectfully urged that the subject application is patentable over the cited reference and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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